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9
10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE EASTERN DISTRICT OF WASHINGTON
12 SPOKANE DIVISION

13 LUCAS M. CHANEY, individually, and as
14 guardian ad litem for TC, a minor, and
15 KATHLEEN CHANEY,
16 Plaintiffs,

17 vs.

18 AUTO TRACKERS AND RECOVERY
19 NORTH LLC, PATRICK K. WILLIS
20 COMPANY, INC., and SANTANDER
21 CONSUMER USA INC.,

22 Defendants.

23 PATRICK K. WILLIS COMPANY, INC.,
24 a California corporation,

25 Cross-Claim Plaintiff,

26 vs.

27 AUTO TRACKERS AND RECOVERY
28 NORTH LLC, an Idaho limited liability
29 company,

30 Cross-Claim Defendant.

Case No. 2:19-cv-00272-SAB

DEFENDANT PATRICK K. WILLIS
COMPANY INC.'S MOTION TO
SEAL DECLARATION OF STEVEN
SCHELK

DEFENDANT PATRICK K. WILLIS COMPANY INC.'S
MOTION TO SEAL DECLARATION: 1

LAW OFFICES OF
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A PROFESSIONAL SERVICE CORPORATION
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1 COMES NOW, Cross-Claim Plaintiff Patrick K. Willis Company ("PK
2 Willis"), by and through its counsel of record, and hereby files this Motion to Seal
3 the Declaration of Steven Schelk (the "Declaration"). The Declaration was filed
4 on December 16, 2020, and is now being filed as a proposed sealed document.
5

6 PK Willis seeks to seal the Declaration in order to keep confidential the
7 Master Service Agreement (the "MSA") that is attached thereto as Exhibit A. The
8 MSA has been designated as a confidential document, without any dispute from
9 the other parties, pursuant to the parties' Protective Agreement. Declaration of
10 Trevor R. Pincock in Support of Motion to Seal, Exhibit A. The MSA was
11 designated in this manner because it contains proprietary information, including
12 pricing terms, that should remain confidential.
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16 In conclusion, PK Willis respectfully requests that the Court grant this
17 motion and permit PK Willis to file the Declaration under seal pursuant to the
18 Protective Agreement in order to protect the confidentiality of the MSA.
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DEFENDANT PATRICK K. WILLIS COMPANY INC.'S
MOTION TO SEAL DECLARATION: 2

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1 DATED this 17th day of December, 2020.

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4 LUKINS & ANNIS, P.S.

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6 By /s/ Trevor R. Pincock
7 TREVOR R. PINCOCK, WSBA #36818
8 CHARLES HAUSBERG, WSBA #50029
9 Attorneys for Defendant Patrick K. Willis
10 Company, Inc.
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DEFENDANT PATRICK K. WILLIS COMPANY INC.'S
MOTION TO SEAL DECLARATION: 3

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 17th day of December, 2020, I served the foregoing to the following:

Alexander B. Trueblood
Trueblood Law Firm
1700 Seventh Ave., Suite 2100
Seattle, WA 98101-1360
alec@hush.com

☐ U.S. Mail
☐ Hand Delivered
☐ Overnight Mail
☐ Telecopy (FAX)
☒ Via email / ECF

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☐ Overnight Mail
☐ Telecopy (FAX)
☒ Via email / ECF

Attorneys for Defendant Auto Trackers and
Recovery North LLC

/s/ Marianne Love
MARIANNE LOVE, Legal Assistant

DEFENDANT PATRICK K. WILLIS COMPANY INC.'S
MOTION TO SEAL DECLARATION: 4

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